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December 10, 2015

Via ECF

The Honorable District Judge George B. Daniels
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *Laydon v. Mizuho Bank, Ltd. et al.*, No. 1:12-cv-03419-GBD-HBP;
Sonterra Capital Master Fund Ltd. et al. v. UBS AG, et al., No. 1:15-cv-05844-GBD-HBP

Dear Judge Daniels:

We represent the HSBC defendants in the above-referenced actions. We write on behalf of all non-settling defendants that have appeared in either or both actions ("Defendants") to request a 17-day extension of their deadlines to respond to the amended complaints due to be filed by plaintiffs on December 18, 2015.¹

At the October 8, 2015 hearing in these matters, the Court set a schedule for the filing of amended complaints and responses. Plaintiffs' deadline to file amended complaints was set for December 1, 2015, and Defendants' deadline for responding was set for January 15, 2015 in *Sonterra* and January 31, 2016 in *Laydon*. (Oct. 8, 2015 Hearing Transcript at 9:24 to 10:5, 12:1).²

On November 30, 2015, the Court extended plaintiffs' deadline to file their amended complaints by 17 days, from December 1, 2015 to December 18, 2015, but it did not address Defendants' corresponding deadlines for responding. (ECF Nos. 539 & 104).

Defendants respectfully request a commensurate 17 day extension of their deadlines to respond to the amended complaints, thus making Defendants' response deadlines consistent with the original schedule. With this extension, Defendants' new deadlines will be February 1, 2016 in *Sonterra* and February 17, 2016 in *Laydon*.

We have conferred with counsel for plaintiffs, and they agree to the requested extension, subject to the Court's approval.


¹ Defendants expressly reserve all defenses in these actions, including as to personal jurisdiction.

² For defendants who have not been served or waived service, the Court indicated that they would have, at a minimum, 30 days to respond after they are served. (Oct. 8, 2015 Hearing Transcript at 9:24 to 10:5). The deadlines set at the hearing and requested in this letter do not apply to such defendants.

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We thank the Court for its attention to this matter.

Respectfully submitted,



Gregory T. Casamento
Counsel for HSBC Defendants

cc: All Counsel of Record (by email)